

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No.

19-34574-KRH

Chapter 7

**AMENDED NOTICE OF (I) APPLICATION FOR ALLOWANCE OF
COMPENSATION AND EXPENSE REIMBURSEMENT AND RELATED SEAL
PLEADING AND (II) RESCHEDULED HEARINGS THEREON**

PLEASE TAKE NOTICE that Foley & Lardner LLP (“**Foley**”), Special Counsel to Lynn L. Tavenner, Chapter 7 Trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan, PLLC filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) the following:

- 1) Final Application for Compensation of Fees and Expenses of Foley & Lardner LLP (the “Application”) for the period from January 30, 2020 to July 31, 2023 [Docket No. 1960] seeking final approval of (a) hourly compensation in the amount of \$1,015,159.20, (b) certain contingent compensation in the amount of \$1,087,430.18, (c) the reimbursement of expenses in the amount of \$101,549.39, and (d) Foley’s Contingent Fees in the aggregate amount that is the greater of (i) Foley’s hourly rate multiplied by hours expended and (ii) the proportion of Foley’s hours invested versus Quinn Emanuel’s hours invested for all contingency-based matters for which both Foley and Quinn Emanuel Urquhart & Sullivan LLP rendered services; and
- 2) Motion Requesting Authorization to Seal Final Application of Foley & Lardner LLP, as Special Counsel to the Trustee, for Approval and Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from January 30, 2020 through July 31, 2023 [Docket No. 1958].

(collectively, the “**Pleadings**” and each a “**Pleading**”). **You previously received Notices of the filing of these Pleadings [Docket Nos. 1959 and 1961] indicating hearings thereon on August 28, 2023, at 11:00 a.m. Please disregard such prior notices. By agreement of all requisite**

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

Persons, and in accordance with the Local Rules of this Court and the Case Management Order as defined below, the hearings thereon have been rescheduled to September 28, 2023, at 11:00 a.m. (prevailing Eastern Time)

UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THE PLEADINGS AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED AS DIRECTED BELOW BY SEPTEMBER 18, 2023, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE PLEADINGS AS CONCEDED.

HEARINGS TO CONSIDER THE RELIEF REQUESTED IN THE PLEADINGS ARE SCHEDULED FOR SEPTEMBER 28, 2023 AT 11:00 A.M. (PREVAILING EASTERN TIME AT U.S. BANKRUPTCY COURT, U.S. COURTHOUSE, 701 E. BROAD STREET, COURTROOM 5000, RICHMOND, VA 23219.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Pleadings carefully and discuss them with your attorney if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management, and Administrative Procedures [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Pleadings, or if you want the Court to consider your views on the Pleadings, then as indicated previously, by **September 18, 2023** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Pleadings pursuant to Rule 9013-1(H of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Objection Deadline.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties, and any Affected Entity.

PLEASE TAKE FURTHER NOTICE THAT, if any Objection is timely filed, the Court will entertain the Pleadings on **September 28, 2023, at 11:00 a.m. (prevailing Eastern Time)** (or such time thereafter as the matter may be heard) at U.S. Bankruptcy Court, U.S. Courthouse, 701 E. Broad Street, Courtroom 5000, Richmond, VA 23219.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Dated: August 22, 2023
Richmond, Virginia

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

By: /s/ Paula S. Beran

Paula S. Beran, Esquire (VSB No. 34679)

Tavener & Beran, PLC

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Richmond, Virginia 23219

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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and/or the Case Management Order, I certify that on August 22, 2023, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the Case Management Order; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran

Counsel for Lynn L. Tavenner, Chapter 7 Trustee